

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA (PITTSBURGH)**

ANTHONY T. ROMAGNA,
Plaintiff,

CASE NO. 2:21-cv-400
ELECTRONICALLY FILED

vs.

Judge

NISSAN-INFINITI LT, INC.;
EQUIFAX INFORMATION
SERVICES LLC; EXPERIAN
INFORMATION SOLUTIONS, INC.;
and TRANS UNION LLC;
Defendants.

TRANS UNION, LLC’S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC (“Trans Union”) hereby removes the subject action from the Court of Common Pleas, Allegheny County, Pennsylvania, to the United States District Court for the Western District of Pennsylvania, on the following grounds:

1. Plaintiff Anthony T. Romagna served Trans Union on or about March 19, 2021, with a Notice Of Lawsuit and Complaint filed in the Court of Common Pleas, Allegheny County, Pennsylvania. Copies of the Notice Of Lawsuit and Complaint are attached hereto as **Exhibit A** and **Exhibit B**. No other process, pleadings or orders have been served on Trans Union.

2. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”). See Complaint ¶¶ 1 and 77-81.

3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Court of Common Pleas, Allegheny County, Pennsylvania, to the United States District Court for the Western District of Pennsylvania.

5. Counsel for Trans Union has confirmed with the Court of Common Pleas, Allegheny County, Pennsylvania that they have no document or file suggesting any other Defendant has been served. To the best of Trans Union's knowledge, no other named Defendant in this matter has been served as of the date and time of this Notice Of Removal.

6. Notice of this removal will promptly be filed with the Court of Common Pleas, Allegheny County, Pennsylvania and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the Court of Common Pleas, Allegheny County, Pennsylvania to this United States District Court, Western District of Pennsylvania.

Respectfully submitted,

s/Stanley W. Greenfield

Stanley W. Greenfield, Esq. (PA #00622)

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Counsel for Defendant Trans Union, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the **26th day of March, 2021**. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

None.	
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The undersigned further certifies that a true copy of the foregoing was served on the following parties via electronic mail and First Class, U.S. Mail, postage prepaid, on the **26th day of March, 2021**, properly addressed as follows:

<u>for Plaintiff Anthony T. Romagna</u> Gregory T. Artim, Esq. Artim Law, LLC 1751 Lincoln Highway North Versailles, PA 15137	
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s/Stanley W. Greenfield
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Counsel for Defendant Trans Union, LLC